

Before the
Federal Communications Commission
Washington D.C. 20544

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition to Amend Part 68 of the)
Commission's Rules to Include)
Terminal Equipment Connected to)
Basic Rate Access Services Provided)
via Integrated Services Digital)
Network Access Technology)

and)

In the Matter of)

Petition to Amend Part 68 of the)
Commission's Rules to Include)
Terminal Equipment Connected to)
Public Switched Digital Service)

and)

Correction of Part 68 Typographical)
Errors, Clarifications and a Proposal)
for Part 68 Registration Revocation)
Procedures)

CC Docket No. 93-268

RM 7815

RM 6147

NYNEX COMMENTS

The NYNEX Telephone Companies ("NYNEX")¹ hereby comment on the
Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned matter.

I. INTRODUCTION AND BACKGROUND

NYNEX generally supports the Commission's proposed amendments to Part 68 of

¹ The NYNEX Telephone Companies are New York Telephone Company and New England Telephone and Telegraph Company.

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the Rules and Regulations, which governs the terms and conditions for connection of customer-provided terminal equipment to the telephone network. This NPRM was initiated after the Commission received comments indicating overwhelming support for petitions filed by Southwestern Bell Telephone Company (SWB) and the Ameritech Operating Companies. The SWB petition asked the Commission to amend Part 68 to include Integrated Services Digital Network (ISDN) Basic Rate Access (BRA) and commenters on the petition asked the Commission to include ISDN Primary Rate Access (PRA). The Ameritech petition requested amendments to Part 68 to include terminal equipment connected to Public Switched Digital Service (PSDS). NYNEX, in its comments on the original proposal by SWB, supported the proposed changes and stated that the changes were appropriate and necessary.

Part 68 does not currently include requirements based on the unique characteristics of ISDN BRA/PRA and PSDS services. As discussed below, NYNEX supports many of the amendments proposed in the NPRM.

II. PROPOSALS FOR ISDN AND PSDS EQUIPMENT STANDARDS

The proposed amendments add specific technical requirements to protect the network from harm that could be caused by ISDN BRA/PRA and PSDS terminal equipment. NYNEX is in basic agreement with these amendments and provides the following comments as requested by the Commission.

Metallic to Longitudinal Requirements

The Commission proposes new rules to reflect a metallic to longitudinal (M-L) balance requirement for ISDN and PSDS as proposed by SWB, Ameritech and AT&T. There are two measurements of longitudinal balance for terminal equipment. Metallic to Longitudinal (M-L) and Longitudinal to Metallic (L-M). As the commission points out, M-L balance squarely addresses crosstalk which causes degradation of service and is a

harm to the network.² However, L-M balance (proposed by SWB) measures susceptibility to noise being induced on the wire pair connected to unbalanced terminal equipment. NYNEX supports the Commission's recommendation to include M-L requirements in Part 68 and further supports SWB's recommendation to include L-M measurements.

Through Gain Limitations

The proposed amendment to Through Gain Limitations in Section 68.308 is a current project of the Telecommunication Industry Association's TR-41 Committee. The Commission anticipates recommendations will be provided in this proceeding.³ NYNEX believes the Commission should defer action on Through Gain Limitations until the TR-41.9.4 committee has finalized its recommendations and made them available to the public.

Encoded Analog Content/Signaling Interference Requirements

The Commission requested comments on the encoded analog content and signaling interference requirements for ISDN. Presently, ISDN terminal equipment can encode analog signals at higher signal power levels than currently allowed by Part 68. The proposed amendments would extend the encoded analog content protection of Part 68 to ISDN terminal equipment. NYNEX agrees that the limitations on encoded analog content for PRA terminal equipment should be comparable to the limitations for BRA terminal equipment as suggested by SWB in its initial petition. However, NYNEX believes that industry standards bodies are the proper forum to determine the specific signaling interference requirements and how they are to be applied and, as such, recommends that the Commission allow the standards bodies to set these requirements.

Plugs and Jacks

The Commission requests comments on the network connectors used to support

² See NPRM at para. 4.

³ It is our understanding that the TR-41.9.4 committee is in the process of reviewing alternatives and will provide a recommendation as part of a U.S. and Canadian Part 68/CS.03 harmonization effort.

ISDN BRA/PRA and PSDS services.⁴ In the NPRM,⁵ the Commission provides only a partial listing of the Alliance for Telecommunications Industry Solutions Association's (ATIS, formerly the Exchange Carriers Standards Association) T1 Committee's recommendation for network connectors. The Commission lists only the registered jacks for use with ISDN BRA and PSDS, whereas the T 1 recommendation includes additional options/applications as listed below:

1. For 2-wire ISDN BRA, connection of a single line: RJ11C or SJA11
2. For 2-wire PSDS, connection of a single line: RJ11C or SJA48
3. For 2-wire ISDN BRA and PSDS, connection of multiple lines: RJ21X
4. For 4-wire PSDS, connection of a single line: RJ1DC or SJA56
5. For 4-wire PSDS, connection of multiple lines: RJ2DX or SJA57

In addition, the T 1 recommendation includes the following network connectors and associated applications for ISDN PRA and PSDS:

1. For ISDN PRA, connection of single line: RJ48C
2. For ISDN PRA, connection of multiple lines: RJ48H
3. For PSDS (1.544mb/s), connection of single line: RJ48S
4. For PSDS (1.544mb/s), connection of multiple lines: RJ48T

NYNEX supports the utilization of network connectors for ISDN BRA/PRA and PSDS as defined by Committee T 1.⁶ However, NYNEX believes that it would be more appropriate to provide for the use of network connectors through the tariff process. NYNEX recommends that the Commission consider the tariff description alternative to

⁴ See NPRM at para. 6.

⁵ See NPRM at p. 4, fn. 7.

⁶ Work is currently underway in the North American ISDN Users Forum (NIUF) to provide a "common use" physical arrangement that would be a sub-set of the connector list proposed by Committee T 1.

jack selection, as proposed by US WEST (USW) for ISDN and PSDS terminal equipment. USW has proposed that the tariff process as described in Section 68.104 (c), be used to determine the type of jack specified by the RBOC for these services.⁷ This section of the Commission's rules state that "as an alternative to description in subpart F of these rules, connections to the telephone network may be made through standard plugs and standard telephone company-provided jacks or equivalent described in nationwide telephone tariffs".⁸ This approach would allow the RBOCs to provide new services independent of rule revisions. This increased flexibility would foster competition by decreasing time frames for the introduction of services and avoid unnecessary rule changes.

The Commission should consider allowing individual RBOCs the flexibility to work outside Part 68 Rules when introducing new services. Under Commission guidelines, the RBOC could file a tariff and provide interface/technical specifications following network disclosure rules.⁹ The RBOC would be responsible to ensure that the network is properly protected and security is maintained. Requirements would be made publicly available through reference to industry specifications and/or RBOC specific technical specifications using tariffs and network information disclosure procedures. This would release the Commission from the burden of continuously updating and amending Part 68 Rules whenever new technologies and/or services are introduced.

Inverse Multiplexers

The Commission asked for comments on the use of Inverse Multiplexing as ISDN terminal equipment. Inverse Multiplexers have broader applications than these switched digital services and appear to go beyond the scope of this NPRM. This technology could

⁷ See NPRM at para. 6.

⁸ 47 C.F.R. 68.104 (c).

⁹ Since the adoption of Part 68 registration rules, technology has evolved and the burden of keeping Part 68 current has increased. Notwithstanding the Commission's efforts, revisions to Part 68 have lagged behind technological evolution. In order to reduce the burden on the Commission's limited resources and to better permit the rules to reflect current technology, the Commission should consider using the tariff/technical specification process.

be used as CPE to provide Switched and Private Line services at bandwidths from 56kb/s up to and including 1.544mb/s. This technology could also be used as a network element to provide variable bandwidth services. Because of the complex issues involved and the potential impacts on other applications, NYNEX recommends that the Commission refer this matter to the appropriate standards bodies for further investigation and/or consider initiating another proceeding .

III. REGISTRATION REVOCATION PROCEDURES

The Commission's rules do not currently include Part 68 equipment authorization revocation procedures. Presently, no procedures are in place to notify registrants of potential revocation and/or to establish a framework for making a revocation determination. A new revocation procedure, in addition to existing forfeiture penalties, is proposed which would give the Commission the authority to revoke previously registered non-compliant equipment (i.e., equipment which does not reflect the specifications of the equipment actually being manufactured) whose authorization was obtained by fraud, or where continued use of such equipment may be destructive to the telephone network, and therefore not in the public interest.

NYNEX fully supports the Commission's proposed registration revocation procedures which track closely the established procedure for Notice of Apparent Liability for assessment of a monetary penalty.¹⁰ The amendments to Part 68 as proposed provide a registrant a reasonable period of time (usually 30 days) to show, in writing, why the Part 68 registration should not be revoked. .

¹⁰ See 47 C.F.R. 1.80

IV. CLARIFICATION OF EXISTING PART 68 RULES

The Commission has proposed and solicited comments on some clarifications for the existing Part 68 Rules. The clarifications include items such as eliminating the term "protective circuitry," modifying the term "test equipment," and correcting typographical errors including minor word changes. NYNEX is in full agreement with the clarification proposals as stipulated by the Commission in Section IV, Paragraph 13, (a) through (p) of the NPRM.

V. **CONCLUSION**

NYNEX believes that the amendments proposed by the Commission, with a few exceptions discussed above, are appropriate and necessary. They would extend the scope of the current rules to make it clear that ISDN, BRA/PRA and PSDS terminal equipment are covered, and would prevent potential harm to the network that could be caused by such equipment. In addition, the proposed amendments as modified by these comments, would be consistent with industry standards.

Respectfully submitted,

New York Telephone Company

and

New England Telephone and
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By: _____



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